BOOK 34 PACE 404

CHARLES E. ANDERSON

NO. 16785 SQUITY

vs.

: IN THE CIRCUIT COURT FOR

DOLORES MARYLYN ANDERSON

: FREDERICK COUNTY, IN EQUITY

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Answer of Dolores Marylyn Anderson, by Lena Anderson, mother and next friend, to the Bill of Complaint filed against her in this cause respectfully shows unto your Honorable Court:

FIRST: That she admits the allegations contained in the first, second and third paragraphs of said Bill of Complaint.

Respondent is without information as to the balance of the principal now remaining due on said Mortgage, and further answering said fourth paragraph, your Respondent says that it is the duty of the Complainant to make all of said payments as your Respondent has no moneys from which to make said payments.

THIRD: Answering the fifth paragraph thereof, your hespondent is without information as to the expenditure from his funds of an amount in excess of Twenty-five hundred (\$2500.00) Dollars in improving said property enumerated therein, and demands proof thereof.

FOURTH: Answering the sixth paragraph thereof, your Respondent has no knowledge of the Contract of Sale by which the said property is sold and to be conveyed unto Lawrence E. Fulp and Virginia M. Fulp, his wife, for the price of Fourteen-thousand Two-hundred and Fifty (\$14,250.00) Dollars.

FIFTH: Answering the seventh paragraph thereof, your Respondent is without information regarding the transaction in pursuance of and by the terms of
said Contract of Sale and that no part of said funds has been received into
the hands of your Respondent.

SIXTH: Answering the eighth paragraph of said Hill of Complaint, your Respondent says that she is entitled to a one-half interest in the alleged cash payment of Twenty-five hundred (\$2500.00) Dollars to be sade in pursuance of the terms of said Contract of Sale, and that the said Mortgage to be given in the amount of Six-thousand (\$6000.00) Dollars should be payable to your

W. JEROME OFFUTT
ATTORNEY AT LAW
FREDERICK, MD.